

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)
INVESTIGATION BY THE DTE UPON)
ITS OWN MOTION INTO THE)
APPROPRIATE REGULATORY PLAN)
TO SUCCEED PRICE CAP) DOCKET NO. 01-31
REGULATION FOR VERIZON NEW)
ENGLAND, INC. INTRASTATE)
RETAIL TELECOMMUNICATIONS)
SERVICES)
_____)

PETITION TO INTERVENE OF
NEW ENGLAND CABLE TELEVISION ASSOCIATION, INC.

Pursuant to 220 C.M.R. §1.03, the New England Cable Television Association, Inc. ("NECTA") hereby requests to intervene as a party in the referenced Docket.

1. The name and address of the applicant for party status in this Docket is:

New England Cable Television Association, Inc.

100 Grandview Road, Suite 310

Braintree, MA 02184

2. NECTA is a six-state regional association that represents cable television companies and their affiliates throughout New England, including those with cable television systems in Massachusetts.

3. In this Docket, the Department is reviewing the form of regulation for Verizon that will succeed the price cap plan established in docket DPU 94-50. The regulatory scheme that the Department will apply to Verizon pursuant to the proceedings that will be held in this docket will affect, directly or indirectly, all of NECTA's members or affiliates that are or will be in the future be engaged in the provision of telecommunications services within the Commonwealth of Massachusetts. As a representative of companies that may compete for telecommunications customers against Verizon, NECTA will be substantially and specifically affected by the Department's review and decision in this docket.

4. Additionally, NECTA was a party to and an active participant in the original price cap docket, DPU 94-50, and has participated in some of the subsequent investigations of annual compliance filings submitted by Verizon and its predecessors pursuant to the DPU 94-50 final order. As such, NECTA has a comparable interest on behalf of its members in the Department's review of the form of regulation applicable to Verizon that will succeed the plan established in the predecessor case.

5. NECTA's participation as a party in this Docket will protect, in an efficient manner, the interests of those CATV companies with franchises in Massachusetts or their affiliates engaged in telecommunications services that do not otherwise seek party or limited participant status.

6. NECTA has not determined the extent in which it will participate in this docket. Participation will depend on the specific proposals made by Verizon and other parties and may include the presentation of oral and written argument, comments and briefs, conduct of prehearing discovery cross-examination of witnesses, and presentation of testimony and other evidence.

6. Please also add to the Service List and enter on behalf of NECTA in this Docket the appearances of:

William D. Durand, Esq.

Robert J. Munnelly, Jr., Esq.

New England Cable Television Association, Inc.

100 Grandview Road, Suite 310

Braintree, Massachusetts 02184

Telephone: (781) 843-3418

Fax: (781) 849-6267

E-mails: wdurand@necta.ipmail.att.net

Rmunnelly@necta.ipmail.att.net

CONCLUSION

Accordingly, for the foregoing reasons, NECTA respectfully requests that it be granted party status in this Docket.

Respectfully submitted,

NEW ENGLAND CABLE TELEVISION

ASSOCIATION, INC.

William D. Durand, Esq.

Executive Vice President and Chief Counsel

Robert J. Munnely, Jr., Esq.

Director of Legal & Regulatory Affairs

New England Cable Television Association,

Inc.

100 Grandview Road, Suite 310

Braintree, Massachusetts 02184

Telephone: (781) 843-3418

Fax: (781) 849-6267

DATE: April 13, 2001